

EXHIBIT 18

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December 16, 2021

By Electronic Mail

Brian Koide
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Re: WSOU Investments LLC v. Google LLC, No. 20-585 (W.D. Texas)

Brian:


I write in response to Mr. Etheridge's letter of December 8, 2021, which we discussed during the parties' Friday, December 10 meet and confer concerning Google's document production.

First, WSOU requested that we confirm "Google has disclosed all apps that use the Awareness API." As I said on our call, and of course subject to Google's objections and responses to WSOU's requests for production, we confirm that Google is not withholding documents that disclose applications that use or have used Awareness API.

Second, WSOU requested that we confirm "Google has or will promptly produce documents relating to the operation of the Awareness API in such applications." As we discussed, Google is unsure, here, what scope of documents WSOU is requesting confirmation of. We appreciate your clarification during the meet and confer that WSOU is not seeking source code relating to any applications, and we understand that your request refers to, at least, documents concerning application calls to Awareness API. As promised, we will bring this request to our client and provide a further response regarding this category. WSOU does not identify any other categories of documents it believes to be missing from Google's production in this matter.

Thank you, again, for a productive discussion on these issues.

Very Truly Yours,



Erika Warren